

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 01/05/2022

LANDMAN CORSI BALLAINE & FORD P.C.

A NEW YORK PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SHAYNA BRYAN
MEMBER
TEL: (212) 238-4800
EMAIL: sbryan@lcbf.com

120 BROADWAY
13TH FLOOR
NEW YORK, NEW YORK 10271
TELEPHONE (212) 238-4800
FACSIMILE (212) 238-4848
www.lcbf.com

One Gateway Center
22nd Floor
Newark, NJ 07102
Tel: (973) 623-2700

One Penn Center
1617 JFK Boulevard, Suite 955
Philadelphia, PA 19103
Tel: (215) 561-8540

January 5, 2022

Via ECF

Honorable Valerie E. Caproni
United State District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: *Richardson v. National Passenger Corporation d/b/a Amtrak*
Case No. 21-cv-9202 (VEC)

Dear Hon. Caproni:

This firm represents Defendant National Railroad Passenger Corporation (Amtrak) in the above-referenced matter. By way of this letter, the parties jointly and respectfully request a sixty (60) day adjournment of the initial conference currently scheduled to place on January 14, 2022, as well as a commensurate extension of time to file a proposed Civil Case Management Plan and Scheduling Order that is currently due on January 6, 2022.

On December 28, 2021, Amtrak filed a motion pursuant to FRCP 12(b)(2) seeking to dismiss Plaintiff's Amended Complaint for lack of personal jurisdiction; or in the alternative to transfer this action to the District Court for the District of South Carolina. Pursuant to Local Rule 6.1(b) of the Civil Rules for the Southern District of New York, Plaintiff's opposition papers must be served on or before January 11, 2022, and Amtrak's Reply papers must be served on or before January 18, 2022. Accordingly, in the interest of preserving judicial resources, the parties request a sixty (60) day adjournment of the initial conference to March 15, 2022, or until such time that Amtrak's motion is decided.

This is the first request for an adjournment of the initial conference. All parties consent to this request.

Thank you for your attention to this matter. Should the Court require additional information, please contact the undersigned.

LANDMAN CORSI BALLAINE & FORD P.C.

Honorable Valerie E. Caproni
January 5, 2022
Page 2

Respectfully,

/s/ Shayna Bryan

Shayna Bryan

cc: Philip P. Vogt. (via ECF)

Application GRANTED. The initial pre-trial conference, currently scheduled for Friday, January 14, 2022 at 3:30 P.M., is adjourned *sine die*. The Court will reschedule the conference and reset the deadline for pre-conference submissions after the pending motion to dismiss is resolved, unless Plaintiff consents to the transfer of this action to South Carolina.

SO ORDERED.



Date: January 5, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE